

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF CALIFORNIA**

FILED  
CLERK U.S.  
SOUTHERN DISTRICT OF CALIFORNIA  
JAN 4 9:15 AM '08

**'08 MJ0024**

**UNITED STATES OF AMERICA,**

Plaintiff,

v.

TABORA-Paz, Hector

And

THEODOROPOLOUS, Alexandros

Mag. Case Number: \_\_\_\_\_

BY: 

COMPLAINT FOR VIOLATION OF

Title 21, U.S.C., Sections 952 and 960  
Importation of a Controlled Substance

The undersigned complaint being duly sworn states:

On or about January 3, 2008, within the Southern District of California, Hector TABORA-Paz and Alexandros THEODOROPOLOUS, did knowingly and intentionally import approximately 4.0 kilograms of cocaine, a schedule II narcotic, into the United States from a place outside thereof; in violation of Title 21, United States Code, Sections 952 and 960.

And the complainant states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.

  
SIGNATURE OF COMPLAINANT  
SPECIAL AGENT  
U.S. IMMIGRATION & CUSTOMS ENFORCEMENT

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 4<sup>th</sup> DAY OF

Jan, 2008

  
MAGISTRATE JUDGE

**CATHY ANN BENCIVENGO**  
**U.S. MAGISTRATE JUDGE**

1 United States of America  
2 VS.  
3 Hector TABORA-Paz  
4 and  
5 Alexandros THEODOROPOULOS

6 PROBABLE CAUSE STATEMENT

7 On January 3, 2008 at approximately 3:35 p.m., Ruben Sonnie MARTINEZ (later  
8 identified as Hector TABORA-Paz, AKA: Hector TAURA-Paz) and Alexandros  
9 THEODOROPOULOS attempted to enter the United States from Mexico through the San  
10 Ysidro, California, Port of Entry. TABORA-Paz was the driver, and THEODOROPOULOS was  
11 the passenger on a yellow and black 2003 Suzuki GSX-R750 Motorcycle bearing no license  
12 plate.

13  
14 On January 3, 2008, Customs and Border Protection Officers (CBPO) received two  
15 negative Customs Declarations from TABORA-Paz in the vehicle primary lanes. TABORA-Paz  
16 was accompanied by THEODOROPOULOS. A CBP Officer noticed that there was one key on  
17 the key ring used in the ignition, the motorcycle was clean around the gas tank area, and the two  
18 men were wearing semi-casual clothing. The CBPO Officer requested a CBP Canine  
19 Enforcement Officer screen the motorcycle with a Narcotic/Human Detector Dog. The  
20 Narcotic/Human Detector Dog alerted to the presence of a narcotic odor emitting from the  
21 vehicle. The vehicle was referred to the secondary inspection area for further inspection  
22  
23

24  
25 Further examination of the vehicle revealed 3 packages totaling 4.0 kilograms of a white  
26 powdery substance concealed in the air intake box. A random field test of one of the packages  
27 revealed a positive reaction for cocaine.  
28

cel

1 On January 3, 2008, at approximately 5:30 p.m., TABORA-Paz waived his constitutional  
2 rights, as per Miranda, and stated that THEODOROPOULOS was going to pay him \$900.00 to  
3 drive the Suzuki Motorcycle loaded with what he believed to be marijuana from Mexico into the  
4 United States.

5  
6 TABORA-Paz and THEODOROPOULOS were arrested and charged with violation of  
7 Title 21 USC 952, 960, Importation of a Controlled Substance, and were booked into the  
8 Metropolitan Correctional Center, San Diego, CA.  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28